

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

TERRAFORM LABS PTE. LTD. and DO  
HYEONG KWON,

Defendants.

Civil Action No. 1:23-cv-01346-JSR

Hon. Jed S. Rakoff

**STIPULATION AND ~~PROPOSED~~ ORDER  
SETTING FORTH PRETRIAL DEADLINES**

WHEREAS, in light of the adjournment of trial to March 25, 2024, the parties have agreed to serve their oppositions to motions in limine; objections to exhibit lists and deposition designations; and counter-designations in advance of the deadlines set forth in this Court's Individual Rules of Practice (the "Individual Rules"); and

WHEREAS the parties wish to state in one Court-approved document deadlines for the service and/or filing of other pretrial papers in accordance with the Individual Rules and Fed. R. Civ. P. 26(a)(3);

IT IS HEREBY STIPULATED by the parties, through their undersigned counsel, that:

1. The parties shall serve objections to exhibit lists and deposition designations, and shall serve counter-designations, on or before March 1, 2024.

2. The parties shall serve oppositions to <sup>previously served</sup> motions in limine on or before March 11, 2024, and shall file their <sup>new</sup> motions in limine and oppositions thereto with the Court on or before March 11, 2024.

3. The parties shall jointly file with the Court a proposed Pretrial Consent Order (plus a courtesy copy of same for submission to Chambers) as required by Individual Rule 4(b), no later than March 18, 2024.

4. In accordance with Individual Rule 7, the parties shall submit proposed jury charges to the Court on or before March 18, 2024, and proposed one-page preliminary instructions on or before March 20, 2024.

5. In accordance with Individual Rule 6(a), on or before March 20, 2024, the parties shall deliver to the Courthouse mailroom for delivery directly to Chambers marked-up copies of the portions of transcripts of depositions intended to be read into evidence, with particularized objections noted thereon in accordance with Fed. R. Civ. P. 26(a)(3).

6. In accordance with Individual Rule 8, the parties shall submit to the Court proposed voir dire requests on or before March 20, 2024.

7. The parties may agree to extend the deadlines in paragraphs 1 and 2 above without further leave of the Court, but only if the extended deadlines are no later than those set forth in the Individual Rules.

Dated: February 1, 2024

/s/ James P. Connor  
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*Counsel for Defendant Do Hyeong Kwon*

SO ORDERED:

  
Jed S. Rakoff  
United States District Judge  
2-2-24